

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA,

v.

SERGEY SHESTAKOV,

Defendant.

Case No. 23 Cr. 16 (JHR)

**DECLARATION OF RITA M. GLAVIN IN SUPPORT OF
SERGEY SHESTAKOV'S MOTION TO DISMISS**

I, RITA M. GLAVIN, an attorney admitted to practice before this Court, hereby declare pursuant to 28 U.S.C. § 1746 as follows:

1. I am a principal of the law firm Glavin PLLC and represent Mr. Sergey Shestakov in the above-captioned action.

2. I submit this declaration in support of Mr. Sergey Shestakov's motion to dismiss. I have knowledge of the issues described herein.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the United States Department of Treasury's December 19, 2018 Letter to Senator Mitch McConnell, which can be found at https://ofac.treasury.gov/system/files/126/20181219_notification_removal.pdf.

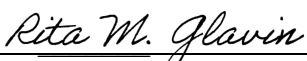
4. Attached hereto as **Exhibit 2** is a true and correct copy of the United States Department of Treasury's December 19, 2018 press release, which can be found at <https://home.treasury.gov/news/press-releases/sm576>.

5. Attached hereto as **Exhibit 3** is a true and correct copy of the United States Department of Treasury's January 27, 2019 Press Release, which can be found at <https://home.treasury.gov/news/press-releases/sm592>.

6. Attached hereto as **Exhibit 4.1** is a true and correct copy of part 1 of the video recording of the November 21, 2021 meeting that the U.S. Attorney's Office provided to the defense pursuant to Rule 16 discovery in this case, Bates numbered USAO_00007650.

7. Attached hereto as **Exhibit 4.2** is a true and correct copy of part 2 of the video recording of the November 21, 2021 meeting that the U.S. Attorney's Office provided to the defense pursuant to Rule 16 discovery in this case, Bates numbered USAO_00007650.

Dated: New York, New York
February 16, 2024



Rita M. Glavin